

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK

-against-

— JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay,"  
— DASHAWN DAVIS, a/k/a "Rock,"  
— JEFFREY BROWN, <sup>2</sup>,  
— JONATHAN HERNANDEZ,  
— HABIYB MOHAMMED,  
— [REDACTED]  
— JAHILYL LAYNE, a/k/a "Lyl,"  
— [REDACTED]  
— [REDACTED]  
— [REDACTED]  
— JAREL ROBINSON, a/k/a "Rel,"  
— TYRONE GIBBS, a/k/a "Tata,"  
— LOUIS WILLIAMS, a/k/a "Lou Money,"

Defendants.

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuse defendants JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," DASHAWN DAVIS, a/k/a "Rock," JEFFREY BROWN, JONATHAN HERNANDEZ, and HABIYB MOHAMMED of the crime of **CONSPIRACY IN THE FIRST DEGREE**, in violation of Penal Law §105.17, committed as follows:

The defendants, in the County of New York, and elsewhere, during the period from on or about June 26, 2008, to on or about the date of this indictment, with intent that conduct constituting the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE**



SECOND DEGREE and CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE be performed, said crimes each being a class "A" felony, and being over eighteen years of age, agreed with each other, and with others, and with one or more persons under sixteen years of age to engage in and cause the performance of such conduct.

### THE CONSPIRACY

During the period of this conspiracy, the defendants were members and associates of a street gang, hereinafter referred to as "The 137th Street Crew," which was principally engaged in the sale and possession of cocaine, in the form commonly known as crack, and the possession of firearms, in the vicinity of West 137<sup>th</sup> Street, between Lenox and Seventh Avenues. "The 137th Street Crew" was principally comprised of members of two Central Harlem street gangs or crews, "2 MAFIA FAMILY" (2MF or 2 DEEP) and "GOONS ON DECK" (G.O.D.), who had residential, family or social ties to the vicinity of West 137<sup>th</sup> Street, between Lenox and Seventh Avenues.

The defendants, and other members and associates of "The 137th Street Crew," in furtherance of the narcotics trafficking business, utilized female members to transport loaded firearms in order to reduce the likelihood of firearms being detected and seized by law enforcement.

It was part of said conspiracy for defendants JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," [REDACTED] JAHLYL LAYNE, a/k/a "Lyl," DASHAWN DAVIS, a/k/a "Rock," [REDACTED] JONATHAN HERNANDEZ, LOUIS WILLIAMS, a/k/a "Lou Money," and JEFFREY BROWN, to serve as street level narcotics sellers of "The 137th Street Crew" by (1) obtaining and transporting quantities of crack cocaine,



(3) purchasing, receiving, packaging, and storing quantities of crack cocaine; (3) communicating with each other and others for the purpose of engaging in crack cocaine sales; (4) distributing and selling quantities of crack cocaine; (5) possessing and discharging firearms to protect the geographic area controlled by "The 137th Street Crew" and to discourage and repel incursions by rival street gangs; (6) utilizing violence, including shootings and beatings to protect their narcotics trafficking business and to (a) enhance their status within and without "The 137th Street Crew," (b) compete with rival street gangs, (c) discourage members, associates, and others from providing information about "The 137th Street Crew" to law enforcement, (d) retaliate against members, associates, and adversaries for having provided information about "The 137th Street Crew" to law enforcement, and (e) to enforce discipline within "The 137th Street Crew;" (7) utilizing individuals under sixteen years of age to possess, package, transport, and distribute crack cocaine; (8) utilizing female members and associates to possess and transport loaded firearms; and (9) protecting members of "The 137th Street Crew" from threats and acts of violence by members of rival street gangs.

It was part of said conspiracy for defendant **HABIYB MOHAMMED** to (1) possess, package, store, and transport crack cocaine; and (2) supervise the possession, transportation, and distribution of crack cocaine to members and associates of "The 137th Street Crew."

It was part of said conspiracy for defendants **JAQUAN LAYNE** a.k.a. "Jay Cash," a.k.a. "Jay," [REDACTED] **JAHLYL LAYNE** a.k.a. "Lyl," [REDACTED] **JEFFREY BROWN**, **JARFL ROBINSON** a.k.a. "R.R.," **JONATHAN HERNANDEZ**, **TYRONE GIBBS**, a.k.a. "Toni," [REDACTED] and [REDACTED] to acquire, possess, transport, keep ready, maintain, display, and discharge loaded



firearms in order to maintain their dominance of the geographic area in which the narcotics business run by "The 137th Street Crew" operated.

It was part of said conspiracy for the defendants to (1) provide intelligence about police activity and enforcement efforts; (2) keep incarcerated members informed of the activities of "The 137th Street Crew" and events occurring in and around the vicinity of West 137<sup>th</sup> Street and Seventh Avenue, including but not limited to (a) arrests of members and associates, (b) acts of retributational violence against members and associates of rival street gangs, and (c) acts of violence committed by members of rival street gangs against members and associates of "The 137th Street Crew," and (3) communicate with members and associates of "The 137th Street Crew" on behalf of incarcerated members of "The 137th Street Crew."

In furtherance of the conspiracy, defendants, and other members and associates of "The 137th Street Crew," both known and unknown to the Grand Jury, concealed the existence and purpose of the criminal conspiracy and the nature of the illegal transactions by performing the transactions in a covert manner.

In furtherance of the conspiracy, defendants, and other members and associates of "The 137th Street Crew," both known and unknown to the Grand Jury, deposited money into the New York City Department of Corrections commissary accounts of incarcerated members and associates of "The 137th Street Crew."



### OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, from on or about July 26, 2008, to on or about the date of this indictment, the following overt acts, among others, were committed in New York County (unless otherwise stated):

1. On or about July 26, 2008, in the vicinity of West 147<sup>th</sup> Street and Seventh Avenue, defendant DASHAWN DAVIS, a/k/a "Rock," possessed a quantity of crack cocaine.
2. On or about February 19, 2009, defendant JAREL ROBINSON, a/k/a "Rel," caused or permitted to be posted, a photograph on the internet website Photobucket.com, depicting himself and defendant [REDACTED]
3. On or about March 15, 2009, defendant JAREL ROBINSON, a/k/a "Rel," caused or permitted to be posted, a photograph on the internet website Photobucket.com, depicting himself and defendant LOUIS WILLIAMS, a/k/a "Lou Money."
4. On or about July 1, 2009, defendant JAREL ROBINSON, a/k/a "Rel," caused or permitted to be posted, a photograph on the internet website Photobucket.com, depicting himself, JAHLVL LAYNE, a/k/a "Lyl," and two members or associates of "The 137th Street Crew," with the caption "37<sup>th</sup> GUNNAS."



5. On or about July 3, 2009, defendant JAREL ROBINSON, a/k/a "Rel," caused or permitted to be posted, a photograph on the internet website Photobucket.com, depicting defendant LOUIS WILLIAMS, a/k/a "Lou Money."
6. On or about July 19, 2009, in the vicinity of West 139<sup>th</sup> Street and Seventh Avenue, defendant [REDACTED] possessed a loaded firearm, to wit, a .25 caliber semiautomatic pistol.
7. On or about July 28, 2009, defendant JAREL ROBINSON, a/k/a "Rel," caused or permitted to be posted, a photograph on the internet website Photobucket.com, depicting himself, defendant DASHAWN DAVIS, a/k/a "Rock," and two members or associates of "The 137th Street Crew."
8. On or about August 21, 2009, defendant JAHLYL LANE, a/k/a "Lyl," caused or permitted to be posted, a photograph on the internet website MySpace.com, depicting himself, defendants JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," DASHAWN DAVIS, a/k/a "Rock," JAREL ROBINSON, a/k/a "Rel," and other members or associates of "The 137th Street Crew."



9. On or about October 1, 2009, in the vicinity of The Rikers Island Jail Complex, defendant **DASHAWN DAVIS**, a/k/a "Rock," engaged in a narcotics-related telephone conversation with defendant **JAQUAN LAYNE**, a/k/a "Jay Cash," a/k/a "Jay," in part and substance informing defendant **JAQUAN LAYNE**, a/k/a "Jay Cash," a/k/a "Jay," that he, defendant **DASHAWN DAVIS**, a/k/a "Rock," was still owed money by "1090 YG."
10. On or about October 1, 2009, in the vicinity of The Rikers Island Jail Complex, defendant **DASHAWN DAVIS**, a/k/a "Rock," engaged in a narcotics-related telephone conversation with defendant **JAQUAN LAYNE**, a/k/a "Jay Cash," a/k/a "Jay," in part and substance asking defendant **JAQUAN LAYNE**, a/k/a "Jay Cash," a/k/a "Jay," if defendant **JAQUAN LAYNE**, a/k/a "Jay Cash," a/k/a "Jay," "WAS FINISHED."
11. On or about October 1, 2009, in the vicinity of The Rikers Island Jail Complex, defendant **JAQUAN LAYNE**, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant **DASHAWN DAVIS**, a/k/a "Rock," in part and substance informing defendant **DASHAWN DAVIS**, a/k/a "Rock," that he, defendant **JAQUAN LAYNE**, a/k/a "Jay Cash," a/k/a "Jay," "STILL HAD A FEW LEFT" and was "WAITING FOR SOME NOW."



12. On or about October 1, 2009, in the vicinity of The Rikers Island Jail Complex, defendant DASHAWN DAVIS, a/k/a "Rock," engaged in a narcotics-related telephone conversation with defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," in part and substance asking defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," if defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," was "in the market."
13. On or about October 1, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant DASHAWN DAVIS, a/k/a "Rock," in part and substance informing defendant DASHAWN DAVIS, a/k/a "Rock," that he, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," "WAS ON 2<sup>ND</sup>," "HUST MARCH 50 GRAMS," and was "ABOUT TO BUY 10, YOU KNOW, I GOT SOME CHICKEN LEFT."
14. On or about October 14, 2009, defendant JAREL ROBINSON, a/k/a "Rel," posted a photograph on the internet website Photobucket.com, depicting himself and a member or associate of "The 137th Street Crew" posing with semiautomatic pistols.
15. On or about October 21, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAHLYL LAYNE, a/k/a "Lyl," engaged in a narcotics-related telephone conversation with defendant DASHAWN DAVIS, a/k/a "Rock," in part and substance informing defendant DASHAWN DAVIS, a/k/a "Rock," that "JAY AND THE GOONS GOT THE CRIB," and that defendant JEFFREY BROWN will be home at the end of the month.



- 16 On or about October 30, 2009, in the vicinity of Essex Avenue and West 137<sup>th</sup> Street, defendant JAHLYL LAYNE, a/k/a "Lyl," possessed a quantity of crack cocaine.
- 17 On or about November 9, 2009, defendant JAREL ROBINSON, a/k/a "Rel," caused or permitted to be posted, a photograph on the internet website Photobucket.com, depicting defendant JAHLYL LAYNE, a/k/a "Lyl," with captions including "2MF," "2DEEP," and "1090 YG."
- 18 On or about November 22, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAHLYL LAYNE, a/k/a "Lyl," engaged in a telephone conversation with defendant [REDACTED] in part and substance instructing defendant [REDACTED] to tell defendant [REDACTED] to put money into the New York City Department of Corrections commissary account of defendant JAHLYL LAYNE, a/k/a "Lyl."
- 19 On or about November 23, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAHLYL LAYNE, a/k/a "Lyl," engaged in a narcotics-related telephone conversation with defendant JEFFREY BROWN, in part and substance advising defendant JEFFREY BROWN to avoid robbing other drug dealers because these "STICKUPS" could be "SETUPS."



7. On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant [REDACTED] in part and substance directing defendant [REDACTED] to tell the crack cocaine buyers that he "IS JAY'S BROTHER, THAT JAY PACKED UP, AND THAT HE IS LOOKING THIS FOR HIM NOW."

8. On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant [REDACTED] in part and substance asking defendant [REDACTED] who is "BAGGING UP THE CRACK" for defendant JEFFREY BROWN.

9. On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant [REDACTED] engaged in a narcotics-related telephone conversation with defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," in part and substance informing defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," that defendant HABIYB MOHAMMED is "BAGGING UP."



20. On or about November 23, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAHLYL LAYNE, a/k/a "Lyl," engaged in a narcotics-related telephone conversation with defendant JEFFREY BROWN, in part and substance asking defendant JEFFREY BROWN who is on "THE BLOCK," that they "NEED TO GET SOME CHICKEN" and that "THEY NOT EVEN HUGGIN' THE BLOCK."
21. On or about November 23, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAHLYL LAYNE, a/k/a "Lyl," engaged in a telephone conversation with defendant [REDACTED] in part and substance instructing defendant [REDACTED] to put money into his New York City Department of Corrections commissary account.
22. On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant JEFFREY BROWN, in part and substance asking JEFFREY BROWN if "THE MONEY WAS FLOWING" on "THE BLOCK" and "WHERE YOU AT?"
23. On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JEFFREY BROWN, engaged in a narcotics-related telephone conversation with defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," in part and substance informing defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," that defendant JEFFREY BROWN was "ON THREE-SEV WITH ZEKE."



24. On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant JEFFREY BROWN, in part and substance stating to defendant JEFFREY BROWN, "YEAH, HUGGIN' THE BLOCK."
25. On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JEFFREY BROWN, engaged in a narcotics-related telephone conversation with defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," in part and substance informing defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," that defendant [REDACTED] "BE FUCKING IT CAUSE THEY ALL KNOW HIM."
26. On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant JEFFREY BROWN, in part and substance asking defendant JEFFREY BROWN, "ZEKE'S BACK OUT THERE?"



27. On or about November 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JEFFREY BROWN engaged in a narcotics-related telephone conversation with defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," in part and substance informing defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," that "IT'S BROWN'S IT'S BROWN'S," that he, defendant JEFFREY BROWN, has been selling on the street for approximately two or three days, and "THE MOST FATIGUE YET WAS A \$70 DOLLAR SALE YESTERDAY."

28. On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant JEFFREY BROWN, in part and substance directing JEFFREY BROWN to "HUG THE BLOCK ON THE FIRST, YOU GOTTA SE OUT THERE IN THE MORNING, THE MORNING, FROM LIKE THE MORNING, JUST SIT IN FRONT OF THE STOOP IN THE MORNING, YOU CATCH ALL THE MORNING FLOW, CAUSE THEY'LL ALL COME SEE YOU, BOOM, BOOM, BOOM, CAUSE THAT'S THE MORNING, THAT'S THEIR FIRST HIGH, SO YOU KNOW THEY'RE GONNA COME OUT THAT."

29. On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant JEFFREY BROWN, in part and substance ordering JEFFREY BROWN to go to the block right now, as there is money to be made selling within the first three days of the month.



30. On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant [REDACTED] in part and substance ordering defendant [REDACTED] to get to the block right now, as they are losing opportunities to make sales.

31. On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant [REDACTED] in part and substance ordering defendant [REDACTED] to go to a basement apartment on West 139<sup>th</sup> Street, between Lenox and Seventh Avenues, and to tell Gloria that he is "JAY'S MAN" and "JAY'S COUSIN" and that she "WOULD TAKE CARE OF YOU."

32. On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant [REDACTED] engaged in a narcotics-related telephone conversation with defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," in part and substance informing defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," that he had already been by the basement apartment and that "EVERYTHING IS GOOD."

33. On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant JEFFREY BROWN, in part and substance asking defendant JEFFREY BROWN if he is "HANGING UP" himself.



34. On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant JEFFREY BROWN, in part and substance ordering defendants JEFFREY BROWN and MALIK LAYNE, a/k/a "Zab," to go the 18<sup>th</sup> floor of defendant JEFFREY BROWN's building and to tell the woman named "BROOKLYN" that "JAY" is locked up and that they are taking over.

35. On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendants JEFFREY BROWN and [REDACTED] [REDACTED] in part and substance informing defendants JEFFREY BROWN and [REDACTED] that defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," is going to give them customers including his "MAN WHO COMES FOR 12 AND 24."

36. On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant [REDACTED] engaged in a narcotics-related telephone conversation with defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," in part and substance informing defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," that he will put money in the New York City Department of Corrections commissary account of defendants JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," and JAHLYI LAYNE, a/k/a "Lyl."



40 On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant HABIB MOHAMMED in part and substance directing defendant HABIB MOHAMMED not to do anything that will draw law enforcement attention to the Layne home.

41 On or about December 2, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant HABIB MOHAMMED in part and substance reminding defendant HABIB MOHAMMED that defendants JEFFREY BROWN and [REDACTED] are new and to "KEEP THEM ON POINT."

42 On or about December 4, 2009, in the vicinity of West 137<sup>th</sup> Street and Seventh Avenue, defendant JEFFREY BROWN engaged in a narcotics-related telephone conversation with defendant JAHLYL LAYNE, a/k/a "Lyl," in part and substance informing defendant JAHLYL LAYNE, a/k/a "Lyl," that defendant JEFFREY BROWN was "ON 37<sup>th</sup> HUGGIN' THIS SHIT."



43. On or about December 4, 2009, in the vicinity of West 137<sup>th</sup> Street and Seventh Avenue, defendant JEFFREY BROWN engaged in a narcotics-related telephone conversation with defendant JAHLYL LAYNE, a/k/a "Lyl," in part and substance informing defendant JAHLYL LAYNE, a/k/a "Lyl," that defendant [REDACTED] was "SUPPOSED TO BE ON THE BLOCK WITH ME, GET CHICKEN", but left to see girls fight at West 149<sup>th</sup> Street and Bradhurst, and that defendant JEFFREY BROWN hopes that defendant [REDACTED] doesn't bring all "THEM LITTLE BITCHES" back to West 137<sup>th</sup> Street and "MAKE THE BLOCK HOT."

44. On or about December 5, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant [REDACTED] in part and substance complaining that members and associates of the "137<sup>th</sup> Street Crew" are "OUT THERE SELLING ALL THESE FUCKIN' DRUGS AND THEY AIN'T SENDING ME NO PAPER."

45. On or about December 5, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant [REDACTED] in part and substance informing defendant [REDACTED] that defendants [REDACTED] and JEFFREY BROWN took over for defendants JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," and JAHLYL LAYNE, a/k/a "Lyl."



46. On or about December 5, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant [REDACTED] in part and substance informing defendant [REDACTED] that defendants [REDACTED] and JEFFREY BROWN, "TOOK ME AND LYL JOB. ME AND LYL WAS OUT HUGGIN' THE BLOCK, THE BLOCK. THAT'S RIGHT. HUSTLIN' ROCK." "WE WAS SELLING WILD DRUGS." "NOW THEY OUT DOING IT. AND I WAS THE REASON JEFF WAS GETTING' ALL THAT COMMISSARY. HE USED TO CALL ME EVER WEEK."

47. On or about December 5, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JAQUAN LAYNE, a/k/a "Jay Cash," a/k/a "Jay," engaged in a narcotics-related telephone conversation with defendant [REDACTED] in part and substance informing defendant [REDACTED] that defendants [REDACTED] and JEFFREY BROWN are "OUT THERE, HUGGIN' THE BLOCK AT 3 IN THE MORNING."

48. On or about December 8, 2009, in the vicinity of The Rikers Island Jail Complex, defendant JEFFREY BROWN engaged in a narcotics-related telephone conversation with defendant JAHLYL LAYNE, a/k/a "Lyl," in part and substance informing defendant JAHLYL LAYNE, a/k/a "Lyl," that defendant JEFFREY BROWN will be "GETTING \$500 TOMORROW."



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SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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THE PEOPLE OF THE STATE OF NEW YORK

~~against~~

Jaquan Layne,

Defendant,

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STATEMENT OF PREDICATE FELONY CONVICTION

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Indictment No. 89/2011

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Cyrus R. Vance, Jr.  
District Attorney  
New York County  
One Hogan Place